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JEB LITTLE CREEK  
5090.3a

EMAIL AND VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY COMMENTS ON THE  
DRAFT FINAL FOCUSED FEASIBILITY STUDY FOR GROUNDWATER SOLID WASTE  
MANAGEMENT UNIT 3 (SWMU 3 ) PIER 10 SANDBLAST YARD JEB LITTLE CREEK  
VIRGINIA BEACH VA  
10/02/2014  
VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

## Landin, Cecilia/VBO

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**From:** Herman, Paul (DEQ) <Paul.Herman@deq.virginia.gov>  
**Sent:** Thursday, October 02, 2014 10:59 AM  
**To:** matthew.stepien@navy.mil  
**Cc:** Boylan.Jeffrey@epa.gov; Price, Nathaniel/VBO; Landin, Cecilia/VBO  
**Subject:** RE: JEB Little Creek - Final SWMU 3 Focused FS  
**Attachments:** Final SWMU 3 Focused FS\_redline VDEQ comments 100214docx.docx

Matt,

VDEQ reviewed the Navy responses to VDEQ comments concerning the Draft Final Focused FS for SWMU 3 and the Final Focused FS for Groundwater at SWMU 3. All VDEQ comments concerning the Draft Final report have been adequately addressed. Comments concerning the Final version of the document are provided in the attached file, a redline/strikethrough version of the document. The remaining concern VDEQ has is for creation of daughter products during the natural attenuation of TCE through biodegradation. VDEQ believes the potential for the presence of daughter products (cis-1,2DCE) in site groundwater at levels exceeding their respective MCLs may prevent UU/UE even if the site COCs attain their respective PRGs. The FFS should acknowledge the possible creation of daughter products and note the LTM plan will include requirements to monitor for any daughter products. A formal comment letter will not be provided at this time. Should you have any questions or require additional information please don't hesitate to contact me via phone or email.

Thanks.

Paul E. Herman, P.E.  
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**From:** Cecilia.Landin@ch2m.com [mailto:Cecilia.Landin@ch2m.com]  
**Sent:** Monday, September 29, 2014 8:27 PM  
**To:** Herman, Paul (DEQ); matthew.stepien@navy.mil; Boylan.Jeffrey@epa.gov  
**Cc:** Nathaniel.Price@CH2M.com  
**Subject:** JEB Little Creek - Final SWMU 3 Focused FS  
**Importance:** High

Team,

Attached are the RTCs regarding the Draft Final Focused FS for SWMU 3. Also attached is a redline version of the text and a final pdf. Following acceptance or resolution of additional comment hardcopies will be prepared for distribution and upload to the Administrative Record. Please note that redline changes are reflective of regulatory as well as internal Navy reviews. In particular, in response to Navy legal comment reference to "deed restrictions" has been removed from the cost estimate as the Navy does not impose restrictions but rather files a survey plat providing notice of LUCs.

Please let me know if you have any questions or trouble with the files. We would like to receive acceptance or additional comment no later than COB Wednesday 10/1 in an effort to have the document in the Administrative Record in advance of resolving Proposed Plan comments and placing the document out for public comment.

Thanks!  
Cecilia